

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 1:19-bk-02858-HWV
Oscar Enrique Parra	:	Chapter 13
Kari Lyn Parra	:	Judge Henry W. Van Eck
Debtor(s)	:	*****
	:	
Nationstar Mortgage LLC d/b/a Mr.	:	
Cooper	:	
Movant	:	
	:	
v.	:	
	:	
Oscar Enrique Parra	:	
Kari Lyn Parra	:	
Charles J. DeHart III, Trustee	:	
Respondents	:	

**OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER TO
CONFIRMATION OF THE AMENDED PLAN (DOCKET NUMBER 53)**

Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Third Amended Chapter 13 Plan ("Plan") filed by Oscar Enrique Parra and Kari Lyn Parra (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 417 Kraiss Avenue, Chambersburg, PA 17201 ("Property").
2. Creditor has filed Proof of Claim number 4 in the amount of \$39,643.68. This amount includes a pre-petition arrearage in the amount of \$16,038.58.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim. Debtor states that it will be resolved in a loan modification.
4. At this time, Creditor has not finalized a permanent loan modification agreement with Debtor.

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5. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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Kari Lyn Parra	:	
Charles J. DeHart III, Trustee	:	
Respondents	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Nationstar Mortgage LLC d/b/a Mr. Cooper to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

Frederic J. Baker, Office of the U.S. Trustee, Region 3, 833 Chestnut St., Suite 500,
Philadelphia PA 19107

Charles J. DeHart III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA
17036

Kara Katherine Gendron, Attorney for Oscar Enrique Parra and Kari Lyn Parra, 125 State
Street, Harrisburg, PA 17101, karagendronecf@gmail.com

Dorothy L Mott, Attorney for Oscar Enrique Parra and Kari Lyn Parra, 125 State Street,
Harrisburg, PA 17101, DorieMott@aol.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on November 26,
2019:

Oscar Enrique Parra and Kari Lyn Parra, 417 Kraiss Avenue, Chambersburg, PA 17201

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ONEMAIN FINANCIAL, BK Real Estate, PO BOX 6043, SIOUX FALLS, SD 57117-6043

DATE: November 26, 2019

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

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